



January 17, 2020

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Via ECF

REPLY TO MINNEAPOLIS

Honorable John R. Tunheim
U.S. District Court for the District of Minnesota
15 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

RE: *Hudock et al. v. LG Electronics U.S.A., Inc.*
No. 0:16-cv-01220-JRT-KMM

Dear Judge Tunheim:

Plaintiffs respectfully request permission to file as supplemental authority, *State v. Minnesota School of Business, Inc.*, 935 N.W.2d 124 (Minn. 2019), for the Court's consideration with respect to Plaintiffs' motion for class certification. This decision was not available at the time the motion was briefed and submitted.

The Minnesota Supreme Court's decision is relevant to (1) the "causal nexus" standard applicable under Minnesota Statutes section 8.31, subdivision 3a, and under the decision in *Group Health Plan, Inc. v. Philip Morris, Inc.*, 621 N.W.2d 2 (Minn. 2001), and (2) its reversal of the court of appeals decision upon which Defendants rely in their opposition, ECF No. 315 at 50.

Respectfully Submitted,

ZIMMERMAN REED LLP

A handwritten signature in black ink, appearing to read "David M. Cialkowski".

David M. Cialkowski
DMC/hsc

cc: All Counsel of Record (*via ECF*)